

United States District Court
WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Case No. 05-0210-SWH-01/06

- (1) RAPHAEL IGBOKWE, a/k/a Ricky Jackson,
(2) KENNEDY IGBOKWE,
(3) GODWIN ILOKA
(4) ROLAND GODFREY, a/k/a Roland Edomobi,
(5) AMAZAIR McALLISTER, and
(6) AMBROSE WOTORSON,

Health Care Fraud - 18 U.S.C. § 1347
NMT 10 Years Imprisonment
NMT \$ 250,000 Fine
NMT 3 Years Supervised Release
\$100 Special Assessment
Class C Felony

I, the undersigned complainant being first duly sworn state that the following is true and correct to the best of my knowledge and belief:

Between on or about January 24, 2002, and September 15, 2005, in Kansas City, Jackson County, within the Western District of Missouri and elsewhere, and in connection with the delivery of and payment for health care benefit services and in a manner that affected interstate commerce, the defendants, Raphael Igbokwe, a/k/a Ricky Jackson, Kennedy Igbokwe, Godwin Iloka, Roland Godfrey, a/k/a Roland Edomobi, Amazair McAllister, and Ambrose Wotorson, did unlawfully, willfully and knowingly execute and attempt to execute a scheme and artifice to (i) defraud a health care benefit program, namely, the Medicare program, and (ii) obtain, by means of false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of a health care benefit program, namely, the Medicare program, all in violation of Title 18, United States Code, Section 1347.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the facts set forth in the attached affidavit.

Continued on the attached sheets and made a part hereof: [X] Yes [] No.

[Signature line]

/s/ Rebekah Wiles
Rebekah Wiles, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 12, 2005
Date

at Kansas City, Missouri
City and State

SARAH W. HAYS
United States Magistrate Judge
Name and Title of Judicial Officer

/s/ Sarah W. Hays
Signature of Judicial Officer